

FILED

NOV 28 2007
11-28-07
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JAMES FARIS

07CR 781

U.S. Magistrate Jeffrey Cole

**GOVERNMENT'S MOTION TO SEAL COMPLAINT, AFFIDAVIT IN SUPPORT OF
COMPLAINT, AND ARREST WARRANT**

Now comes the UNITED STATES OF AMERICA, by PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, and states as follows in support of its Motion to Seal the Complaint, the Affidavit in Support of the Complaint, and the Arrest Warrant:

Special Agent Brian Wentz of the United States Federal Bureau of Investigation is the primary source of information for the Complaint, the Affidavit in Support of the Complaint, and the Arrest Warrant. The Affidavit details the facts supporting probable cause that, on February 6, 2006, James Farris ("Farris"), by force and violence, and by intimidation, did take from the person and presence of bank employees, approximately \$11,793 in United States currency belonging to, and in the care, custody, control, management, and possession of a bank, namely, Founder's Bank, located at 23840 West Eames Road, Channahon, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a). If Faris were made aware of the existence of the Complaint and the Arrest Warrant, Faris likely would flee this jurisdiction. In addition, if Faris were made aware of the facts in the Affidavit in Support of the Complaint, there is the danger that Faris could threaten or harm witnesses, or destroy evidence.

For the foregoing reasons, the government respectfully requests that the Complaint, the Affidavit in Support of the Complaint, and the Arrest Warrant be sealed until the arrest of Faris.

Respectfully submitted,

PATRICK J. FITZGERALD
United States Attorney

By: Sheri H. Mecklenburg
SHERI H. MECKLENBURG
Assistant United States Attorney
219 South Dearborn Street
Chicago, Illinois 60604
(312) 469-6030

DATE: November 28, 2007